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11 **IN THE UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA, NORTHERN DIVISION**

13 MISSION HEALTHCARE SERVICES,  
14 LLC, a California limited liability company;  
15 and HEALTHY LIVING AT HOME -  
16 CARSON CITY, LLC, a Nevada Limited  
17 Liability Company,

18 Plaintiffs,

19 v.

20 BATTLE BORN HOME HEALTH, LLC, a  
21 Nevada limited liability company; JESSICA  
22 CONNANT (CRISP), an individual;  
23 ANGEL VASQUEZ BARNES, an  
24 individual; and JOSEPH BARNES, an  
25 individual,

26 Defendants.

**Case No.: 3:22-cv-00333-LRH-CLB**

**ORDER TO CONSOLIDATE AND  
EXTEND PLAINTIFFS' DEADLINE  
TO FILE RESPONSES TO  
DEFENDANTS' MOTIONS TO  
DISMISS, AND PROPOSED ORDER**

***FIRST REQUEST***

27 **STIPULATION**

28 Plaintiffs MISSION HEALTHCARE SERVICES, LLC and HEALTHY LIVING AT  
HOME – CARSON CITY, LLC, (“Plaintiffs”) and Defendants ANGEL VASQUEZ BARNES  
and JOSEPH BARNES (together, the “Barnes”), and Defendants JESSICA CONNANT  
(CRISP) (“Connant”) and BATTLE BORN HOME HEALTH, LLC (“Battle Born,” and  
together with Plaintiffs, Connant, and the Barnes, the “Parties”), by and through their respective  
counsel of record, hereby stipulate and agree as follows.

1           1. Connant and Battle Born filed their Motion to Dismiss, or in the alternative, Motion  
2 for a More Definite Statement (the “Battle Born MTD”) on October 3, 2022 (ECF No. 19).

3           2. Plaintiffs’ response to the Battle Born MTD is currently due by October 17, 2022.

4           3. Plaintiffs and the Barnes have stipulated to extend the deadline for the Barnes to  
5 file a response to the Complaint, until and including October 14, 2022, which Order granting  
6 said stipulation was entered herein on September 30, 2022 (ECF No. 18).

7           4. Plaintiffs understand that the Barnes also intend to file a motion to dismiss (the  
8 “Barnes MTD”).

9           5. Based on an anticipated filing date of October 14, 2022, Plaintiffs’ response to the  
10 anticipated Barnes MTD would be due by October 28, 2022.

11           6. Due to a family emergency of counsel for Plaintiffs, the Parties agree to consolidate  
12 and extend the deadline for Plaintiffs’ responses to the Battle Born MTD and the forthcoming  
13 Barnes MTD, until and including November 4, 2022.

14           7. This is Plaintiffs’ first request for an extension of time to respond to the Barnes  
15 MTD and the Battle Born MTD.

16           8. This stipulation is made in good faith and not in an attempt to delay proceedings.

17 Dated this 14th day of October, 2022.

Dated this 14th day of October, 2022.

18 */s/ John R. Funk*

*/s/ Sydney R. Gambee*

19 John R. Funk, Esq. (NSB 12372)  
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*Attorneys for Plaintiffs Mission Healthcare  
Services, LLC and Health Living at Home –  
Carson City, LLC*

1 Dated this 14th day of October, 2022.

2 /s/ Ryan D. Russell


3 Ryan D. Russell, Esq. (NSB 8646)  
4 ALLISON MACKENZIE, LTD.  
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Carson City, Nevada 89702

5 *Attorneys for Battle Born Home Health, LLC*  
6 *and Jessica Connant*

7  
8 **ORDER**

9 **IT IS SO ORDERED.** Plaintiffs shall have until and including November 4, 2022 to file  
10 their response(s) to the Barnes MTD and the Battle Born MTD.

11 DATED this 17th day of October, 2022.

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14 LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE

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